

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
KEITH M. SCRIVEN	:	Bankr. Case #22-11818 (AMC)
	:	
Debtor.	:	Chapter 11
	:	
	:	

**OBJECTION TO DEBTOR'S PROPOSED AMENDED PLAN FOR
REORGANIZATION BY THE UNITED STATES TRUSTEE**

Andrew R. Vara, United States trustee for Regions 3 & 9, ("UST"), by and through undersigned counsel, hereby submits the following Objection to Debtor's proposed Amended Plan of Reorganization:

1. Debtor's Amended Plan for Reorganization fails to attach the Exhibit A as provided for therein.
2. Debtor's proposed plan does not appear to be feasible. More particularly, the proposed plan does not provide information as to which properties will be sold, how and when they will be marketed, a timeline for marketing and sale, by whom they will be marketed and for how much. Additionally, the proposed plan does not provide for the possibility that the properties are not able to be sold within the time frame anticipated. Further, Debtor's financial reports to date fail to demonstrate the ability to fund the Plan.
3. Debtor's proposed plan provides for payment of priority taxes within 60 months of the Effective Date of the plan contrary to Section 1129(a)(9)(C) of the Bankruptcy Code which requires payments to be made within 5 years of the date of the filing for bankruptcy relief.

4. Debtor's proposed plan further fails to provide that the Debtor shall not be discharged on account of governmental claims until they are paid in full in accordance with 11 U.S.C. Section 1129(b)(2)(A)(i)(I).

5. Debtor's proposed plan fails to provide for interest to be paid to taxing authorities.

6. Debtor has failed to meet his fiduciary obligations by reason of his failure to provide financial information (Monthly Operating Reports) on a timely basis.

WHEREFORE, this Court should not confirm the Debtor's Amended Plan for Reorganization.

February 16, 2023

Respectfully submitted,

ANDREW R. VARA
UNITED STATES TRUSTEE
For Regions 3 and 9

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